

Michael Langford (9682)  
Alexander E. Ramos (15234)  
LANGFORD | RAMOS PLLC  
43 E. 400 S.  
Salt Lake City, UT 84111  
Telephone: (801) 998-2002  
Email: alex@langfordramos.com

*Attorneys for Allison Marie Bayer*

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**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH**

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UNITED STATES OF AMERICA,  
Plaintiff,

v.

ALLISON MARIE BAVER,  
Defendant.

**STIPULATED MOTION TO EXTEND  
DEADLINE TO FILE RULE 33(a)  
MOTION**

Case No. 2:21-cr-00520

District Judge Jill N. Parrish

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Allison Marie Bayer (“Ms. Bayer”) through undersigned counsel, and pursuant to Federal Rule of Criminal Procedure 45(b)(1)(B) respectfully moves the Court to reschedule the currently scheduled status conference and extend the deadline to file a Rule 33(a) Motion to Vacate Judgment and Grant a New Trial. Counsel for the Government, Briggs Matheson, stipulates to this request.

**Relevant Factual and Procedural Background**

Ms. Bayer has until June 6<sup>th</sup>, 2025, to her File Rule 33(a) Motion to Vacate Judgment and Grant a New Trial. (ECF 265). On April 30<sup>th</sup>, 2025, defense counsel contacted chambers and the government requesting a status conference prior to the May 6<sup>th</sup> deadline to address some pre-filing issues. Alternatively, defense requested an extension of the deadline until after a status

conference is held. Mr. Briggs indicated no objection to extending the deadline to accommodate the status conference request. On May 5<sup>th</sup>, 2025, a status conference was set for June 3<sup>rd</sup>, 2025. Defense counsel noticed that the transcript had not previously been requested by former counsel. Defense counsel ordered the transcript to ensure Ms. Baver's Rule 33 motion was complete. It had anticipated to have it well in advance of today's filing but has not. Defense counsel requests an additional extension to obtain this transcript, review it, and supplement Ms. Baver's motion should it be deemed necessary.

### **Conclusion**

For the reasons argued, Ms. Braver respectfully requests that the Court once again extend the June 6<sup>th</sup>, 2025 deadline to file a Rule 33(a) Motion to Vacate Judgment and Grant a New Trial and reset the currently scheduled status conference. An extension of 45 days is requested.

Respectfully submitted this 30<sup>th</sup> day of May, 2025.

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Alexander E. Ramos  
LANGFORD | RAMOS, PLLC.